

William F. Adler
Executive Director
Federal Regulatory Relations

1275 Pennsylvania Avenue, N.W., Suite 400
Washington, D.C. 20004
(202) 383-6435

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June 5, 1992

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

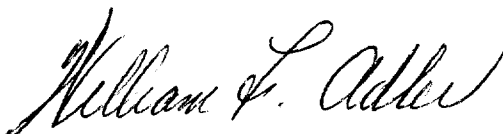
Dear Ms Searcy:

Re: *CC Docket No. 92-105 - The Use of N11 Codes and Other Abbreviated Dialing Arrangements*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "*Comments*" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)
)
The Use of N11 Codes and Other) CC Docket No. 92-105
Abbreviated Dialing Arrangements)
_____)

COMMENTS OF PACIFIC BELL AND NEVADA BELL

JAMES P. TUTHILL
NANCY C. WOOLF

140 New Montgomery St., Rm. 1523
San Francisco, CA 94105
(415) 542-7657

JAMES L. WURTZ

1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 383-6472

Attorneys for Pacific Bell
and Nevada Bell

Date: June 4, 1992

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EXHIBIT A

SUMMARY

The Pacific Companies support the use of N11 codes for public service applications. The Commission should not allow 3 digit dialing for competitive service providers. Any decision in this docket will have implications for other numbering issues. Numbers must be treated as a public resource; no one owns a number. Departure from this position can have serious ramifications for all numbering resources. Also, jurisdictional issues arise since state public utility commissions assert regulatory control over numbers.

If N11 codes are assigned for competitive uses, the allocation of a few codes among many providers presents an inequitable situation. No allocation scheme can truly be fair given that so many entities want so few codes. And, if interexchange carriers and end users also can be eligible for N11 assignment, the problem is exacerbated.

Also, if N11 codes are assigned, they may be subject to recall, if area codes exhaust before interchangeable NPAs are implemented in 1995. Recalling a telephone number, once assigned, will be extremely difficult, if not impossible.

The Pacific Companies believe alternatives exist which can provide numbers to more providers, and therefore, be more equitable and competitive. The Commission should not order local exchange carriers to give away an important public resource like N11 codes.

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COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pursuant to the Notice of Proposed Rulemaking ("NPRM") issued on May 6, 1992, Pacific Bell and Nevada Bell (the "Pacific Companies") file these comments. The Commission seeks comments on many issues concerning the use of three digit dialing in the form N11, to enhanced service providers or others. The Commission has tentatively concluded that it should adopt rules governing the use of certain N11 codes.

N11 codes should only be used for public service applications. The current numbering plan, which provides for 7 or 10 digit numbers assigned for competitive information services, adequately provides for connection to the public switched telephone network by enhanced service providers. Many problems are inherent in assigning N11 codes for competitive services. Allocating the very small number of codes among the many entities that will find them attractive does not promote fair competition since some competitors will have 3 digit

dialing, and most will not. Also, if N11 codes are assigned for local use, they may be subject to recall prior to January 1995 for use as area codes (NPAs), which are close to exhaust. However, reclaiming those codes if needed by the North American Numbering Plan ("NANP") for national purposes would be extremely difficult.

No benefits have been identified which outweigh the significant problems and costs involved in N11 dialing for enhanced service providers. Current numbering (e.g., 900 and 976) consisting of 7 or 10 digits makes available 16 million numbers to these providers. The significant problems with abbreviated dialing, including the limited availability of codes, potential recall of the codes, and the use which will benefit only a small number of providers overshadow any perceived benefits of abbreviated dialing. Therefore, no deviation from the current numbering plan is justified.

I. 3 DIGIT DIALING IS NOT APPROPRIATE FOR COMPETITIVE SERVICES

N11 dialing should be reserved for public benefit uses. Because so few N11 codes are available, it does not make sense to open them to assignment to competitive service providers. It is clear, especially from the interest generated by the issuance of this NPRM, that many entities are interested in having N11 dialing.¹ The scarcity of codes, combined with the difficulty

¹ See section I (C) below.

of allocating them, and the possibility of a recall of those codes, all militate against assigning them for individual service providers. Currently, 411, 611, 811 and 911 are all used to dial services associated with the public benefit.

A. N11 Should Be Reserved For Public Benefit Applications

Currently, N11 codes are reserved nationally for public use applications. The codes in use today, 411, 611, 811 and 911, all support applications which benefit all users of the public switched telephone network in a variety of ways: emergency services, repair services and directory information. The remaining N11 codes should continue to be assigned based on public convenience and necessity. Assigning the available codes to only 4-6 entities providing competitive services does not support this concept since only those few customers of the particular service would benefit from that service. For existing N11 uses, telephone users as a whole derive benefit. While no other public uses of N11 are contemplated presently, such uses may appear over time or with the advent of new technologies. For example, a recent editorial in a California newspaper suggested that 211 or 311 be used as an alternative to 911 for non-dire emergency calls, since overloads of 911 occur because it is used for non-emergency situations.² In the future, more applications for public benefits will emerge.

² Telephone Triage, San Diego Union Tribune, May 23, 1992, at 14, attached as Exhibit A.

B. Existing Uses Of N11 Dialing

1. Continued Use Of 411 Should Be Allowed For Directory Assistance Information That Is Classified As Basic Or Adjunct To Basic.

The Commission proposes not to disturb the use of 411 for directory information services that are classified as basic or adjunct to basic services even if 411 is not used in all geographic areas.³ The Commission seeks comment on whether 411 should be restricted to services that are classified as basic or adjunct to basic. The Pacific Companies support the continued use of 411 for directory information service as an important benefit to all users of the telephone network.⁴ As the Commission notes, Pacific Bell issued a press release saying that it intended to offer expanded 411 service.⁵ However, despite any interpretation of our press release to the contrary, Pacific Bell has no current intention of using 411 or expanded 411 for anything other than basic or adjunct to basic services.⁶

³ NPRM, para. 11.

⁴ Nevada Bell does not use 411 for dialing directory assistance.

⁵ The Commission references press reports on expanded use of 411. NPRM, para. 11.

⁶ Pacific Bell's position may change if enhanced service providers are able to use N11 for their services.

2. 611 And 811 Are Being Used To Benefit The Public.

The Commission seeks comment on whether 611 and 811 should be available for abbreviated dialing even in those areas where they are used by the local exchange carrier.⁷ The Pacific Companies currently use 611 as the number for our repair service. We believe that fast and simple dialing to our repair service is an important part of providing universal service. 611 dialing for repair serves customer convenience, welfare and safety. An easily identifiable number permits customers to reach our repair service in the event of an emergency requiring immediate telephone service restoration. In the wake of recent disasters, such as major earthquakes and fires, the importance of 611 is underscored. Thus, 611 dialing for repair service serves the public the way 911 dialing does. It is also a component of providing local exchange service. Therefore, the Pacific Companies support retention of 611 dialing for repair service as a public convenience.

Nevada Bell uses three digit 811 dialing for its business office.⁸ For many years 811 has been an integral part of Nevada Bell's "Easy to do Business With" advertising campaign. Customers, particularly the elderly and handicapped, find 811 dialing very valuable. 811 dialing, too, is a component of local service. It should be retained as a benefit to the public provided by the local exchange company.

⁷ NPRM, para. 12.

⁸ Pacific Bell does not use 3 digit 811 dialing for its business offices.

3. Some Customers Already Use The Codes 211, 311, 711 and 811

The Commission notes that four codes in the form N11 are apparently not used at all.⁹ To the contrary, the Pacific Companies understand that many of these numbers are in use, although not as destination addresses.

Normally, a number under the NANP serves as the destination address of the called party. However, some companies utilize a three digit number in the form of N11 for connection to various internal services. For example, some Customer Owned Pay Telephone ("COPT") providers use 211 and 311 as dialing numbers in their smart telephone sets. These numbers are listed on the face of the set for end user dialing to repair or other services supplied by the COPT provider. After the end user dials these numbers, the smart set translates and forwards the call to a network destination. Similarly, some cellular telephone systems use 711 and 811 dialing for various services provided by the cellular company. While these N11 numbers are not used as network dialing addresses, end users may be accustomed to using them for various other services. A customer is unaware whether N11 is a network address or just a dialing code which is translated to another number. Therefore, end user confusion could result, when dialing "311" from one telephone connects to an information service provider, and dialing "311" from another telephone connects to a repair office.

⁹ NPRM, para. 9.

C. Allocation Of This Scarce Resource (N11) Will Not Benefit The Industry As A Whole

Two major issues raised by the NPRM are related to assignment and allocation of N11 codes. The first is how to allocate the limited number of codes available.¹⁰ The second concerns whether N11 codes should be available for purposes other than enhanced services.¹¹

Given the scarcity of N11 codes, it is fair to assume that the number of entities who will want codes will exceed the number of codes. Many potential providers will therefore be unable to offer abbreviated dialing to their customers. The Commission has declined to offer an allocation mechanism, but instead, states that any company may allocate in any manner they think proper, given the restrictions in §202 of the Communications Act of 1934.¹² Because the allocation of these few codes will undoubtedly cause dissatisfaction among those not chosen, it will be difficult, if not impossible, to devise an equitable allocation scheme.

Further, the exclusive use of N11 codes by selected enhanced service providers conflicts with the Commission's goal of having a dynamic and robust information services

¹⁰ NPRM, para. 16.

¹¹ NPRM, para. 14.

¹² NPRM, para. 16.

industry.¹³ Only a small portion of the industry would benefit from the availability of these codes (i.e., only those few entities assigned codes). And, new entrants into the information services industry would be disadvantaged since all codes will have already been assigned. This will tend to stagnate competition and growth, rather than foster it.

Even if the Commission found that assigning these few codes for competitive services was in the public interest, the typical allocation mechanisms, such as first come-first served, would present problems. For example, if the standard were first come, first served, an issue arises as to what period of time should apply to the requests. Over the last several years, the Pacific Companies have received a number of requests for some sort of abbreviated dialing. In the past, we have told those companies that N11 codes were not available because of NANP restrictions. If the Pacific Companies were to open codes on a first come, first served basis, some mechanism would need to be devised to accommodate those who sought abbreviated dialing in the past.

The Commission seeks comment on whether N11 dialing should only be available to providers of enhanced services.¹⁴ The Pacific Companies are concerned that restricting abbreviated

¹³ See, e.g., Computer III Remand Proceedings, 6 FCC Rcd 174 (1990) para. 11.

¹⁴ NPRM, para. 14.

dialing to only one type of customer may be unreasonably discriminatory. The Commission has not indicated in its NPRM any reason why this dialing should be limited to one type of telecommunication services provider. Further, since the services supplied under N11 dialing will presumably be local in nature, the state public utilities commissions should have oversight as to the beneficiaries of any service offering.

Enhanced service providers are not the only parties interested in 3 digit dialing. Interexchange carriers ("IXCs") and end users may also find value in the easy recognition and dialing of N11. In fact, IXCs and end users have already begun to seek N11 codes for unspecified services.¹⁵ This further exacerbates the problem of providing a few subscribers with an easy to remember, easy to dial number, while the majority of other customers, including competitors, are precluded from using the same thing. Because of the potential competitive edge given to some members of the industry, we may see an increase in adversarial proceedings from those entities who do not receive an N11 code.

¹⁵ Pacific Bell has recently received a request for an N11 code from an interexchange carrier. That carrier referenced this docket as support for its ability to receive an N11 code. Also, in the last few weeks, various end users notified the Pacific Companies that they will be requesting assignment of an N11 code.

Also, if interexchange carriers can receive an N11 code with no limitations as to usage, they could use that code for access to their networks, as an alternative to 10XXX dialing and other forms of access. The Commission would need to address how N11 dialing relates to existing access methods in terms of availability, price, and structure. Further, creating a new form of access, which would not be available to all IXC's, poses equal access and MFJ implications.

If the Commission limits the assignment of N11 codes to enhanced service providers, problems of enforcement arise. Who determines whether a company is truly providing enhanced services? The Pacific Companies should not be charged with policing the use of the public network. Many companies, including interexchange carriers, also operate as enhanced service providers. Who will determine whether, for a particular application, a company is either an enhanced service provider or an interexchange carrier? The Pacific Companies do not want to become the watchdog as to whether a company is truly providing an enhanced service.

D. Recall Of Assigned Codes Poses Customer Difficulties

The NANP has reserved the use of N11 codes for national purposes. Because NPAs in the traditional N 0/1 X format are on the verge of exhaust, both SAC (N00) codes and N11 codes are being reserved for possible use as area codes before interchangeable NPAs are implemented in January, 1995. The

Commission proposes to allow assignment of N11 codes with the understanding that these codes are subject to recall by the NANP administrator for use as area codes, on "short notice."¹⁶ However, a provision for recall on "short notice" is simply inconsistent with the long notice that local exchange carriers must give to subscribers when phone numbers change.

The Pacific Companies' experience is that customers strongly resist externally imposed telephone number changes. In order to meet customers' demands, the Pacific Companies must give substantial notice about any change. For example, in NPA splits, the Pacific Companies' give considerable advance warning that a number change is required so that stationery, advertising, etc. can reflect the change. Pacific Bell notifies the California PUC and its subscribers at least two years in advance that an NPA split is necessary: a 15-month advance written notice of the split is widely publicized, and then a minimum 6 months of permissive dialing is allowed before the split is complete. California law now mandates that customers be notified 24 months in advance of an NPA split.¹⁷

However long or short the notice that might be given, recent experience with Carrier Identification Codes ("CICs") has demonstrated how difficult it is to recall a network based code, once a customer has begun to use it. When the supply of 3 digit

¹⁶ NPRM, para. 13.

¹⁷ California Public Utilities Code sections 7930 and 7931.

CICs was exhausting, the NANP tried to reclaim codes that companies held in excess of the number allowed in the CIC Assignment Guidelines which had been agreed to by industry consensus. A number of holders of CICs refused to return codes they had acquired causing an acceleration of the date for expansion of the codes to 4 digits. Given the industry's lack of cooperation in returning codes once they are in use, expecting industry compliance, especially on short notice, is unlikely.

Even if a Commission regulation required return of the code, an entity may still resist returning it. If N11 codes are assigned as the Commission has proposed, then the product identity of the service will be so closely aligned to the telephone number that the provider may believe that returning the number may be tantamount to going out of business. If that is the case, entities holding N11 codes will resist returning them at all costs. Time consuming and expensive litigation may be necessary to reclaim a code. In addition to those costs, the public would suffer because of the uncertainty about whether the code could ever be reassigned. Further, the Commission would need to determine how N11 codes would be recalled. Would all N11 codes be recalled, or just one or two? How would the determination be made as to which N11 code is to be recalled? For all of these reasons, recalling codes, once allocated, will probably be extremely difficult to administer.

E. N11 Dialing Can Cause Customer Confusion If No Standardization Is Required In Number Assignment

Under the Commission's proposal for local N11 dialing, different entities may be able to use the same N11 code in different areas. Unless the Commission imposes some standards on the provision of service, customer confusion will result. For example, a customer may dial "511" from his home and be connected to an information services company which has a menu of items he could be connected to, such as financial information. That same customer could dial 511 from a neighboring area and be connected to dial-a-porn. These problems underscore the confusion that will result from assigning an N11 code for competitive services. While the same problems could occur with 7 digit dialing, customers understand that dialing the same number in different NPAs will connect the customer with different entities. That is not true for current N11 dialing, which does not vary by NPA.

F. Other Abbreviated Dialing Patterns Should Not Be Allowed

The Commission seeks comment on other abbreviated dialing arrangements such as, *XX, XX#, etc.¹⁸ The Pacific Companies note that they have received a request for ** abbreviated dialing. The Commission should not allow these alternative abbreviated dialing patterns. There are a myriad of alternative dialing arrangements that could be created using

¹⁸ NPRM, para. 19.

numbers with or without combinations of # and *. In the current generation of switches, the symbols # and * have certain meanings. To change those switches to recognize abbreviated dialing with these symbols requires new software development by the switch vendors.¹⁹ Such development typically takes 18 months to 2 years following development of standards by Bellcore or industry agreement. Such standards or industry agreement itself could take 18 months to 3 years. Each switch in the network would then have to be upgraded with the new software.

The costs of the software upgrades can only be determined once the standards have been developed. As an example, though, the software cost alone for CIC expansion ranges from \$5,000-\$65,000 per switch. The Pacific Companies have over 800 switches in their networks. Similar substantial costs would need to be incurred for each new dialing pattern allowed.

And, for many of the alternatives noted, very few providers would have use of the alternative dialing patterns. For example, ** would serve only one customer. Requiring major switch upgrades to benefit a few providers is not cost effective and is not in the public interest.

¹⁹ Electromechanical switches could not handle these dialing patterns.

Also, in the NPRM, the Commission appears to endorse the use of NPAs for abbreviated dialing.²⁰ Currently, the NANP administrator is reserving N11 codes for use as geographic NPAs, as a stopgap measure should a code or codes be needed prior to the implementation of interchangeable NPA codes (INPA) in 1995. Once INPA is implemented, area codes must be used for their intended purpose as part of the 10 digit NANP address. They should not be available for abbreviated dialing purposes.

II. BROADER ISSUES OF NUMBERING ARE RAISED IN THE DECISION TO ALLOW N11 DIALING

Until the service connected to an N11 code is defined, it is difficult to comment on the ramifications of the Commission's proposal concerning dialing. When considering 3 digit dialing, the Commission should consider other numbering ramifications such as the jurisdictional constraints on regulation, the precedence that a policy on the value of numbers will have on assignment of other resources, and alternatives which exist for this type of numbering.

A. The Commission's Proposal Simply Provides Abbreviated Dialing And Describes No Service On Which The Pacific Companies Can Comment

The Commission has addressed N11 dialing as a service. It is not. N11 is a dialing method. The nature of the service that N11 connects to is unknown. Serious problems are associated

²⁰ NPRM, para. 4.

with ignoring the service connected to an N11 code. If these services vary, end user confusion may result. However, telephone companies have no way to comment on the feasibility of a service that is not described anywhere.

The Commission is correct that most switches contain the software necessary to recognize a dialing pattern in the form N11.²¹ There are many different ways switches can be configured to recognize N11 dialing. In that respect, N11 is easier and cheaper to implement than some alternative dialing patterns. However, the cost of implementing N11 dialing is dependent on the network configuration to which it is connected. For example, an N11 code can be translated to a line number in the same switch as the calling party. While this would only enable the customer with the N11 number to be reached by others served by the same switch, the costs associated with the implementation would be minimal. Contrast that with an N11 code associated with an outgoing trunk group, such as with 411 and E911 (in essence a private network). These networks are very costly to build. If a similar network were proposed to be used with other N11 codes, the costs and time involved would be great. Thus, the configuration of the service that will be connected to the N11 code determines the costliness and feasibility of providing the dialing pattern.

²¹ NPRM, para. 9.

B. N11 Codes, If Assigned, Should Be Treated Like Other Numbering Resources

As stated earlier, N11 codes should be retained for public uses yet to be developed. However, the Commission seeks comment on whether, if assigned, N11 codes should be treated as every other telephone number. The Commission notes that because of the value of N11, different rules perhaps should apply.²²

N11 codes, like every other number, are part of the public resources administered by the NANP. The Pacific Companies support the use of the NANP, and do not believe the Commission should undermine the goals of the NANP. Therefore, N11 codes, like other numbers should not be treated as a commodity.

C. Jurisdictional Issues Need To Be Assessed Before Regulating N11 Codes

The Commission's NPRM also raises jurisdictional issues. The Commission seeks comment on whether to reclaim 611 and 811 from local exchange carriers.²³ However, 611 and 811 are used for purely local services, with no interstate aspect of the communications. As intrastate services, they are regulated by the state public utility commissions. Similarly, the Commission's proposal on N11 use by enhanced service providers appears to be for local information services. Even if the FCC

²² NPRM, para. 15.

²³ NPRM para. 12.

has authority over certain aspects of numbering, the FCC does not have authority over purely intrastate communications.²⁴

The broad language of §2(b)(1) [47 U.S.C. 152(b)(1)] makes clear that the sphere of state authority which the statute 'fences off from FCC reach or regulation' Louisiana PSC, 476 U.S. at 370, 106 S.Ct. at 1899, includes, at a minimum, services that are delivered by a telephone carrier 'in connection with' its intrastate common carrier services.²⁵

Certainly, telephone repair and business office services are delivered in connection with intrastate services. Local information services which originate and terminate within the same state are intrastate services. The Commission's interest in N11 codes is limited to federal interests such as nondiscriminatory allocation of such codes, and the determination of some uniformity of service offerings.

D. The Commission Should Examine Alternatives Which Allow Connection to More Entities

The proposal contained in the NPRM provides potential openings for 4-6 information providers in a given area. The Pacific Companies believe that the public interest requires more than this limited use of N11. As stated earlier, those N11 codes should be assigned to applications for public welfare,

²⁴ 47 U.S.C. 152(b).

²⁵ People of State of California v. FCC, 905 F.2d 1217 (9th Cir. 1990).

convenience, and necessity. But, there are alternatives that could connect thousands of service providers to the public.

One alternative would be to use another 7 digit number that is easily recognizable. At present, the only nationwide unoccupied prefix is 555, which is not used except for those local exchange companies who offer directory information through the use of 555-1212 (with or without NPA) and for media-related fictitious telephone numbers. The Pacific Companies strongly believe that 555-1212 should be retained for use by local exchange companies. Other numbers with the 555 prefix could be made available to competitive services, opening up almost 10,000 numbers in each NPA. Certainly, a dialing pattern which connects to 10,000 providers is preferable to an N11 which provides connection to one party. While some network costs would be involved with opening up these numbers, they will not be prohibitive since switches will recognize the number as simply a 7 digit number like any other telephone number.

A second alternative is to use a single N11 code as the first 3 digits of a 7 digit number as opposed to an access code. Thus, a recognizable number designated N11-XXXX could be used to provide access to competitive services within each area code. This use of N11 would also allow 10,000 numbers to be served by that easily recognizable number. This alternative would be more difficult to implement since technical requirements would need to be written and vendor software/hardware development work would be

necessary. The costs involved in implementing this alternative would be substantial, necessitating some mechanism for cost recovery. And, more importantly, this alternative would not preserve the 3 digit N11 code for public benefit use in the future.

Another alternative is to use N11 as a common carrier gateway to a variety of information services. It could be structured so that end users may have access to menu-driven choices of services and providers. As with the other alternatives, this gateway service could accommodate many more than one service provider, and could benefit the public through connection to a wide range of information services. The details on how such a service would be structured, its technical parameters, and who would provide it, all raise significant issues which need to be investigated. However, if the Commission is going to allow any new forms of abbreviated dialing, these 3 alternatives that allow connection to the network for many providers, should be considered.